Zachary C. Oren, Esq. Attorney at Law 401 Rutger Street Utica, NY 13501

September 30, 2021

Honorable Andrew T. Baxter U.S. Magistrate Judge P.O. Box 7396 Syracuse, NY 13261-7396

Re: Puleo v. Masonic Medical Research Institute, et al. Civil Act. No.: 6:20-cv-1593 (TJM/ATB)

Dear Judge Baxter:

Please receive this letter request for a sixty (60) day extension to the FRCP 16 scheduling order deadlines in the above captioned matter. Please be advised all parties have been diligently prosecuting and defending the matter. The initial paper discovery responses have been exchanged and the mediation has been completed. The parties are continuing to work on this matter, but attorney caseloads are high. Hence the reason for this request.

I have shared this letter with opposing counsel and he does not oppose the requested extension.

I thank the Court for its understanding and patience with this matter.

Respectively,

/s/ Zachary C. Oren

Zachary C. Oren, Esq.

CC: Adam P. Mastroleo, Esq. (via cm/ecf filing) Hannah K. Redmond, Esq. (via cm/ecf filing)